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The American Waterways Operators

DEPT OF TRANSPORTATION



Executive Offices

1600 Wilson Boulevard
Suite 1000
Arlington, VA 22209

TEL: (703) 841-9300
FAX: (703) 841-0389

Jennifer A. Kelly
Senior Vice President
Government Affairs & Policy Analysis

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April 10, 2001

Docket Management Facility
U.S. Department of Transportation
Room PL-401
400 Seventh Street, S.W.
Washington, D.C. 20590-0001

Re: Numbering of Undocumented Barges
(USCG-1998-3798) -15

Dear Sir or Madam:

The American Waterways Operators (AWO) is the national trade association representing the inland and coastal tugboat, towboat, and barge industry. AWO's members include the owners and operators of undocumented inland tank and dry cargo barges that will be affected by the Coast Guard's establishment of a barge numbering system pursuant to the Abandoned Barge Act of 1992. We appreciate the opportunity to comment on the notice of proposed rulemaking (NPRM).

AWO appreciates the Coast Guard's effort to construct the numbering system required by law in a manner that minimizes administrative burdens on barge owners. We are particularly pleased that the Coast Guard has adopted the recommendations previously made by AWO and the congressionally authorized Towing Safety Advisory Committee with regard to the numbering of once-documented and inspected barges and has not proposed a user fee for issuance of a Certificate of Number. We also appreciate the Coast Guard's proposal to allow a five-year phase-in period for the marking of existing barges. Each of these provisions is significant in reducing unnecessary administrative and financial burdens on barge owners.

We do, however, urge the Coast Guard to reconsider its proposal to require that undocumented barges be marked differently from documented barges. Current regulations (46 CFR 67.120 et seq.) require that documented barges be marked with the barge's official number on some clearly visible internal part of the hull. Documented barges must be marked externally with the vessel's name and hailing port. We recommend that the same requirements be applied to undocumented barges. Specifically, we urge that the NPRM be amended to specify that undocumented barges be marked internally with numerals not less than **three** inches in height (versus four as specified in the NPRM) and to eliminate the requirement that the barge number be marked on the exterior of the hull. Instead, the Coast Guard should require that the exterior of the barge be marked with the vessel's name and hailing port, as required for documented vessels. The readily visible barge

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name could be used to cross-reference the number and identify the owner if the Coast Guard concludes that boarding an abandoned barge would pose a safety hazard. Given that the Coast Guard's own analysis demonstrates that the proposed numbering requirement is not cost-beneficial, we urge the agency not to exacerbate the burden on barge owners by requiring the establishment of distinct marking systems for documented and undocumented barges.

Thank you for the opportunity to comment. We would be pleased to answer any questions or provide additional information to assist the Coast Guard in the development of a final rule.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Kelly".

Jennifer A. Kelly